

# **Chatham-Kent Public Library**

## **Privacy Policy**

### **Purpose**

Chatham-Kent Public Library (CKPL) is committed to protecting the privacy of information given by individuals wishing to use the services of the library. The Library collects this information in accordance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) R.S.O. 1990, Chapter M. 56 and under the authority of the Public Libraries Act, R.S.O., 1990, Chapter P. 44 in order to conduct library operations.

### **Information Collected**

CKPL collects the following information when registering a new user:

- Name
- Address
- Telephone number
- Name of parent or guardian (in the case of minor children under 16 years of age)
- Email (optional)
- Date of birth

### **Reason for Collecting Information**

Personal information is collected and used by internal staff for the purpose of providing library services including, but not limited to, the following:

- Access to library materials and services
- Patron notification about materials, services, fines, fees, events, fundraising and other Library initiatives
- Program registration
- Computer use and bookings
- Automated telephone system
- Electronic newsletters and marketing of library resources and services
- Electronic communications including but not limited to email receipts, alerts for holds, due dates, fines, fees or outstanding library materials
- Library fundraising
- Non-identifying statistical purposes
- Fraud prevention or abuse of library services

CKPL engages various third-party digital services for Library users (e.g. interlibrary loan, downloadable media and electronic databases). CKPL may use Zoom, Facebook Live, Google Meets, Skype, Microsoft Teams and/or other interactive audio and visual platforms for virtual programming, outreach and meetings. Where such third party

platforms are used, CKPL may require that participants complete a separate consent form as a condition of their participation in the programming in question. Information collected by third parties is stored on servers outside the control of the Library.

CKPL also engages third-party services for online registration and renewals. Limited personal information, including name and address, is collected and/or accessed by the third party to verify library card accounts. Information collected is inputted via API into CKPL's integrated library system.

No credit card account numbers are collected or stored in Library databases during ecommerce transactions via the online catalogue, library website or express checkouts.

Information will only be used for the purpose for which it was collected, and will not be disclosed except with consent of the patron or as required by law.

## **Consent**

Consent to collect personal information is provided by the patron or guardian in any one of the following scenarios. The personal information may be provided in person, in writing, or electronically – and this policy covers all three circumstances.

- At the time of registration for library membership.
- Accepting and signing a CKPL card.
- Completing and submitting a form (e.g. new patron registration, comment form, purchase suggestion, and material reconsideration request).
- Signing a photograph or video release form.
- Registering for a library program, service or event.
- Contacting Ask CKPL via phone, email, text or Facebook chat.
- Participating in a virtual meeting using a third-party online meeting tool (e.g. Zoom).

Patrons may choose to not provide all requested information. However, this may result in the Library not being able to provide the patron with all available services.

Parents or guardians must give consent for a child under the age of 16 to access library services. CKPL is unable to collect parental consent for virtual cards.

## **Disclosure of Personal Information**

CKPL has a responsibility to respect the privacy of patrons and the confidential nature of personal information. Staff may view and amend patron records as required to perform appropriate library functions. Staff are not permitted to view or amend records outside the scope of their duties.

Personal Information may be provided to law enforcement officers by the CEO/Chief Librarian, or designate. Other Library staff are not permitted to release personal information.

Personal information may only be disclosed if:

- A subpoena or court order is presented, or an active law enforcement investigation is underway.
- An active investigation is being conducted by the Children's Aid Society regarding a child in need of protection.
- An adult patron gives written consent.
- A parent or guardian for minor children (under the age of 16) gives written consent.
- Information is required to ensure the safety of Library staff, to protect the Library property, or to enforce Library policy.
- In accordance with section 32 of MFIPPA.

Parents and guardians may request access to library records for children under the age of 16. Access to records may be provided after the identity of the parent or guardian is confirmed and the age of the child is established.

Personal Information may be provided to a third party for collection of overdue materials and associated fines.

Staff who are registered as patrons of the Library have the same privacy and confidentiality rights as members of the public in relation to their activities as patrons.

### **Accuracy**

CKPL updates patron information regularly. Patrons may change their personal information at any time, by visiting any branch location or by electronically accessing their account through the CKPL online catalogue. Identification with name, birth date and a current address is required to verify patron records for full library membership (photo identification is preferred).

### **Retention of Information**

Personal information is collected voluntarily and stored electronically on database servers located in Canada. Personal information is used to create a borrower record. Borrower records allow the library to assign resources and services to an individual. Resource and service transactions remain on the database:

- As long as circulation records indicate an item remains on loan.
- As long as fees or fines associated with library materials or services remain unpaid.
- Indefinitely as a historical record of items lost, and material fees and fines paid
- Indefinitely to provide a circulation record for Home Service patrons, and to assist Library staff with the selection of materials for patrons unable to independently attend the library.

Patrons may elect to save their reading history via the online catalogue. This history is not accessible to Library staff.

Patrons may use phone, email, text messages or social media to communicate with Library staff. Email communication will be stored in authorized Library staff email accounts. Authorized Library staff use Google Messages to communicate with patrons via text message and communications may be stored on that platform. Communication via social media (e.g. Facebook Messenger) may be stored on the social media platform. Patron communication may be deleted by Library staff at any time.

Personal records of all patrons who have not used their cards in the previous seven (7) years and do not have outstanding fines are purged on an annual basis. Records of long overdue fees and fines older than seven (7) years are also purged on an annual basis.

Temporary backup files of database transactions are created and saved on a regular schedule. Files are saved for the purpose of restoring data in case of a system failure and are stored securely, and disposed of on a routine schedule.

All history or cache files which might identify how a person has used a Library computer are erased daily when the computer is rebooted. Patrons are encouraged to delete their browsing history and temporary Internet files at the end of each session so personal information is not accessible by subsequent users.

Library patrons are responsible for deleting any personal information created and stored on electronic devices borrowed from the Library as well as any purchased content downloaded to electronic devices borrowed from CKPL.

## **Disposal**

Paper records no longer needed to conduct Library business are shredded prior to disposal. Electronic media are sanitized by Municipal IT Services prior to disposal utilizing secure wipe software or in some cases physical disk drive shredding.

## **Electronic Messaging**

All electronic messaging sent by the library is consistent with the Canadian Anti-Spam Legislation (CASL).

At the time of registration for a library card, specific personal information is collected (see "Information Collected" above). Obtaining a library card implies the patron's consent to authorize the Library to send electronic notifications regarding personal borrowing and transaction activities if an email address was provided at the time of registration. Patrons may request not to receive electronic notifications although such an action may affect their ability to use the affected library services.

The Library may use electronic means to promote services, share information, or announce special events. The Library will provide an opportunity for patrons to sign up

to receive such specific notifications, and will seek the patron's consent before sending promotional electronic messages and notifications. The Library will provide options to patrons to easily unsubscribe from these services or to change their preferences at any time.

This policy may be revised at any time without notice, and shall be effective as of the date of the revision.

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Author: H. Wyma

Background Documents: CKPL Children's Services Policy, Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) R.S.O. 1990, Chapter M. 56; the Public Libraries Act, R.S.O., 1990, Chapter P. 44; An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act, S.C. 2010, c. 23

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